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Attorneys for the Plaintiff

18 **UNITED STATES DISTRICT COURT**
19 **SOUTHERN DISTRICT OF CALIFORNIA**

20 **Patricia Connor**, Individually and on
21 Behalf of All Others Similarly Situated

22 Plaintiffs,

23 v.

24 **JPMorgan Chase Bank and Federal**
25 **National Mortgage Association a/k/a**
26 **Fannie Mae,**

27 Defendants.
28

Case No: 10-CV-01284 DMS(BGS)

CLASS ACTION

**JOINT MOTION FOR AN
EXTENSION OF TIME TO FILE THE
MOTION FOR PRELIMINARY
APPROVAL OF CLASS ACTION
SETTLEMENT**

1 WHEREAS the Parties filed a Notice of Settlement on July 8, 2011 notifying
2 the Court that this matter would be settled on a class-wide basis;

3 WHEREAS the Court ordered the filing of the Preliminary Approval papers
4 to be filed by September 15, 2011;

5 WHEREAS the Parties have endeavored to conduct confirmatory discovery
6 prior to the submission of the Preliminary Approval papers, and based upon that
7 plan to draft all settlement paperwork and to plan to complete confirmatory
8 discovery prior to submission of those papers, requested a sixty (60) day
9 continuance to file the Preliminary Approval motion by November 14, 2011;

10 WHEREAS the Parties are conducting confirmatory discovery, and are
11 assembling the Class list, which will be required when sending out required notice
12 to all Class members if the Court grants preliminary approval of the class
13 settlement;

14 WHEREAS in conducting confirmatory discovery, the Parties have questions
15 relating to the Class list, and need additional time to complete the confirmatory
16 discovery and determine the exact number of members of the Class and their
17 identifying information. Both sides are currently employing technical consultants
18 to review the data to verify the accuracy of the Class list;

19 WHEREAS the size and accuracy of the Class list, prior to the granting of
20 preliminary approval, is critical to the timely and efficient administration of any
21 settlement class;

22 THEREFORE, based on the above identified issues regarding the
23 determination of the Class, the Parties request an additional four weeks, until and
24 including, December 15, 2011, to file the Preliminary Approval Motion for Class
25 Settlement, which will allow the Parties to verify the accuracy of the Class list and
26 complete the confirmatory discovery prior to submitting a request to the Court for
27 preliminary approval of the settlement class.
28

HYDE & SWIGART
San Diego, California

1 Respectfully submitted,

2 Dated: November 15, 2011

Hyde & Swigart

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4 By: /s/ Joshua B. Swigart
Joshua B. Swigart
Attorneys for Plaintiff

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6 Dated: November 15, 2011

**Burke, Warren, MacKay &
Serritella, P.C.**

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9 By: /s/ LeAnn Pedersen Pope
LeAnn Pedersen Pope
Attorneys for Defendant
JPMorgan Chase Bank

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12 Dated: November 15, 2011

AlvaradoSmith, APC

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14 By: s/ Christopher Yoo
Christopher Yoo
Attorneys for Defendant
Federal National
Mortgage Association

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19 IT IS SO ORDERED.

20 DATED 12-1-11

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22 
UNITED STATES DISTRICT JUDGE